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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Application of Pacific Gas and Electric
Company to Revise Its Electric Marginal
Costs, Revenue Allocation, and Rate Design.

U 39 M

Application No. 19-11-019
(Filed November 22, 2019)

**MOTION OF PACIFIC GAS AND ELECTRIC COMPANY FOR
ADMINISTRATIVE LAW JUDGE RULING ORDERING SUBMISSION OF
THE MARGINAL GENERATION CAPACITY COST (MGCC) STUDY IN
THIS DOCKET ON THE SAME DATE IT IS SUBMITTED IN A.20-10-011,
AND DIRECTING SUBMISSION OF TESTIMONY AND HEARINGS ON
THE MGCC STUDY AND ISSUES TO OCCUR JOINTLY WITH THE
SAME MATTERS PURSUANT TO THE SCHEDULE IN A.20-10-011**

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Dated: January 14, 2022

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SUBMISSION OF THE MARGINAL GENERATION CAPACITY
COST (MGCC) STUDY IN THIS DOCKET ON THE SAME DATE IT
IS SUBMITTED IN A.20-10-011, AND DIRECTING SUBMISSION
OF TESTIMONY AND HEARINGS ON THE MGCC STUDY AND
ISSUES TO OCCUR JOINTLY WITH THE SAME MATTERS
PURSUANT TO THE SCHEDULE IN A.20-10-011**

Pursuant to Rule 11.6 of the Commission's Rules of Practice and Procedure, Pacific Gas & Electric Company (PG&E) moves for an Administrative Law Judge (ALJ) Ruling directing that the MGCC Study agreed upon in the SETTLEMENT AGREEMENT IN PG&E'S 2020 GENERAL RATE CASE PHASE II (APPLICATION A.19-11-019) ON REAL TIME PRICING ISSUES INCLUDING A STAGE 1 PILOT, (RTP Settlement, filed January 14, 2022 with the motion for approval of the RTP Settlement), be filed on the same date in this docket as it is required to be filed in A.20-10-011, the proceeding for the real-time commercial electric vehicle rate (DAHRTP-CEV). PG&E further requests an ALJ Ruling setting dates for MGCC related testimony and hearings for this proceeding on a combined basis with the same issues in the DAHRTP-CEV case.

PG&E, the California Large Energy Consumers (CLECA), the Public Advocates Office at the California Public Utilities Commission (Cal Advocates), Enel X North America, Inc. (Enel X), and the Small Business Utility Advocates (SBUA) have been diligently working on the MGCC study. CLECA, Cal Advocates, Enel X and SBUA have authorized PG&E to represent that they support this motion.

The Settling Parties agree that the MGCC issues to be studied in A.20-10-011 and A.19-11-019 are identical and that there should be only one such MGCC study prepared for use in both proceedings. (RTP Settlement, Section V. B. 6. b.)

On page 16, the RTP Settlement states,

Accordingly, in a motion, to be filed under separate cover in A.19-11-019, the Settling Parties are also supporting PG&E's request for a prompt ruling from the Assigned Administrative Law Judge approving the recommendation to combine consideration of the identical remaining MGCC study issues under a single procedural schedule, in whatever manner can be most expeditious. By supporting the Motion, the Settling Parties seek to avoid duplicative parallel consideration of identical MGCC Study issues, to ensure efficient use of the parties' and the CPUC's scarce resources as well as consistency in the CPUC's treatment of MGCC issues across PG&E's various pending rate proceedings.

The Settling Parties are aware that the schedule for the MGCC study and issues was set in the December 17, 2021 Amended Scoping Memo in the DAHRTP-CEV case. The Settling Parties also know that on January 6, 2022, PG&E filed a motion in A.20-10-011 for an 8-week extension of the Amended Scoping Memo dates. On January 14, 2022, the Presiding Administrative Law Judge issued a ruling granting PG&E's request for an extension and establishing a new procedural schedule for the MGCC study and issues in A.20-10-011 (ALJ Ruling).

Information about the MGCC schedule and motion in A.20-10-011 is contained in the RTP Settlement, pages 16 to 17,

The Settling Parties agree that they can participate in the MGCC study to the extent they wish through whatever combined process for consideration of the MGCC Study is established (such as whatever the Assigned ALJ may decide in ruling on the above-reference Motion, to be filed under separate cover in A.19-11-019).^{ftn 12} Specifically, in the DAHRTP-CEV proceeding, PG&E has already been ordered to conduct and serve this MGCC Study on January 18, 2022. The December 17, 2021 Amended Scoping Memo in A.20-10-011 also established that, based on this MGCC Study, opening testimony would be submitted on or about February 21, 2022, with rebuttal testimony due March 11, 2022, to be followed by hearings if necessary, briefing and a CPUC decision. Interested parties may also submit stipulations instead of, or in addition to, testimony. On January 6, 2022, PG&E filed a motion to extend the procedural dates for the MGCC study and related testimony by eight weeks.

Ftn 12 from RTP Settlement: A suggested schedule for the presentation of

Study results and resulting MGCC proposals had been included in PG&E Exhibit 22 in A.20-10-011. However, the CPUC's final decision in that proceeding (D.21-11-017) set a schedule for presentation of the MGCC study and for service of opening, reply and rebuttal testimony. That schedule had assumed that necessary data would be received from Energy Division by August 2021, to allow sufficient time to submit the Study for presentation January 18, 2022. However, initial data was not received until September 24, with additional necessary data received on November 9, November 17, and November 23 of 2021. The Schedule outlined in Exhibit PG&E-22 (from A.20-10-011 for CEV RTP for Schedule BEV, [386579738.pdf \(ca.gov\)](#)) turned out to be infeasible primarily because the delivery of all necessary data from Energy Division was delayed by nearly three months. The SMEs appreciate Energy Division's provision of data in request to their responses given Energy Division's significant workload with the IRP and IDER proceedings, among others. However, only after receiving and examining the final dataset in late November did the Study participants have confidence that they had received the best-available data from Energy Division that could be used to complete the study. Study participants have been working diligently since receiving the first, incomplete data in September, and now believe that the final report can be produced in a shorter period than the 5-6 months originally estimated, but no earlier than mid-March 2022.

The substantive reasons for why an 8-week extension for the MGCC study and corresponding MGCC issues are necessary apply equally for DAHRTP-CEV in A.20-10-011 and the Stage 1 RTP pilots in A.19-11-019. If resolution of the MGCC issues in the two proceedings were to differ, the consequence would be different MGCC RTP generation rates, for BEV and the C&I/residential RTP pilots. This result would add complexity to calculating for the different MGCC hourly rate components in the customer tool and the broadcast of different RTP rate information to customers and third parties. Moreover, using different MGCC RTP generation rates for a given hour would not make sense, since the RTP rates are meant to convey information about the electric grid each hour,

Resolution of the motion for the 8-week extension has occurred in A.20-10-011, phase 2. Therefore, the purpose of this motion is to obtain an ALJ ruling in A.19-11-019 to coordinate the MGCC study and MGCC issues in the two proceedings into one set of hearings and testimony pursuant to the schedule adopted in the ALJ Ruling issued January 14, 2022.

Therefore, PG&E respectfully requests an ALJ ruling to address the MGCC study

and issues in this case, with the same MGCC study and issues in A.20-10-011, pursuant to the schedule in A.20-10-011. Time is of the essence, since the RTP issues in A.19-11-019 are going to hearing later this January. Resolution of the scheduling questions presented in this motion sooner rather than later would benefit everyone, enabling the parties to manage their work on MGCC issues better, and the Commission and ALJ to decide the MGCC issues in one place.

Respectfully Submitted,

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